

REMARKS

Reconsideration of the application is respectfully requested.

Upon entry of the foregoing amendments, claims 1-82 are pending in the application, with claims 1, 3, 13, 28, 39, 58, 66, and 74 being the independent claims. Claim 82 has been added.

Based on the above Amendment and the following Remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

The Office Action on page 2, in section 1, objects to claim 42 because of an informality. Claim 42 has been amended to correct this informality. Applicant therefore requests that this objection be withdrawn.

The present invention relates to providing an enhanced file format to store large quantities of variable-sized data records on a storage medium. In an exemplary embodiment of the invention, referring to Figures 3-5, for example, a computer readable medium may contain a file 200 for storing a root storage 210. The root storage 210 may include a model directory 300 that includes at least one model 310. The at least one model may include a model header 314. See, e.g., Specification, page 4, lines 11-16. In a further embodiment of the invention, the at least one model may also include element lists 315 that include element chunks 320. The element chunks 320 may include elements, where elements are variable-sized data records. See, e.g., Specification, page 7, lines 1-2.

Rejections under 35 U.S.C. § 102(e)

The Office Action on pages 2-8, in section 4, rejects claims 1-7, 15-18, 26-30, 38-39, 49-50, 52-53, 55-56, 58-62, 66-70, and 74-78 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,584,480 to Ferrel et al. Based on the following remarks, Applicant respectfully traverses this rejection.

Claim 1 recites "a computer readable medium containing a file for storing a root storage including a model directory comprising at least one model, wherein said at least one model comprises a model header." Referring to Figures 3-5, for example, in an exemplary embodiment of the invention, a computer readable medium may contain a file 200 for storing a root storage 210 including a model directory comprising at least one model 310, wherein said at least one model comprises a model header 314.

Ferrel teaches an authoring environment for producing content for Web sites known as the "Multimedia Publishing System." Ferrel discloses "Multimedia Document Format" (MDF) files that are used to provide content for displayed online stories. See, Ferrel, col. 20, lines 52-62. The MDF files in Ferrel are object linking and embedding (OLE) files that contain IStreams and IStorages. According to Ferrel, there are four main parts to the MDF file: 1) the tagged text streams; 2) embedded OLE object data stream; 3) embedded OLE object result stream; and 4) the find property stream. See, Ferrel, col. 21, lines 17-23.

Ferrel does not anticipate claim 1 for at least the following reasons. First, Ferrel does not teach or suggest the recited model directory. Claim 1 recites "a root storage including a model directory." A model directory holds a list of models, each with a unique name. The model directory holds great significance, in that it is the starting point for a computer program to read all other information in the file. Referring to Figure 10, the Office Action asserts that Ferrel teaches a root storage 550 including a model directory, but does not provide a citation to where a model directory is shown in Ferrel. After a thorough review of the reference, Applicant submits that Ferrel does not teach or suggest the recited model directory. Ferrel does cite "for example, the table of contents (TOC) and abstract would be stored in the head stream of the MPML object". In this context, the TOC is merely one example of tagged data that may or may not be present in the Ferrel invention. It does not fulfill the role of model directory as disclosed in the current invention, since it does not hold a list of models in the file, does not comprise at least one model, and in fact may not be present at all. The Examiner is requested to identify the disclosure in Ferrel that allegedly discloses a model directory.

Second, Ferrel does not teach or suggest the recited model. Claim 1 recites "a model directory comprising at least one model." In an exemplary embodiment of the invention, models may include element lists that comprise element chunks. See, e.g., Specification, page 7, line 1. Further, a model may group related elements for any purpose relevant to an application (e.g., applications that store large quantities of variable-sized data). The purpose of this strict hierarchy (model directory contains model contains element list contains element chunk contains element) is to facilitate efficient loading and more importantly re-saving of individual elements as they change in size without rewriting the entire model. See, e.g., Specification, page 9, lines 24-25. The Office Action appears to align the recited model with the Multimedia Publishing Markup Language (MPML) object 556. See, Ferrel, col. 23, lines 22-36. As discussed above, a model may group related elements. To the contrary, the MPML object 556 in Ferrel is used to separate certain tagged information, such as a Table of Contents or abstract, from text corresponding to the main document (e.g., the story). See, Ferrel, col. 23, lines 24-36. Because the MPML object 556 is merely a free-formed series of tagged text, and does not contain individually identifiable, addressable and modifiable subcomponents, it cannot be said to group related elements for any purpose relevant to an application. Accordingly, Ferrel does not teach or suggest the recited model. Because Ferrel does not teach or suggest at least the above-described elements of claim 1, Ferrel does not anticipate claim 1.

In view of the above, Applicant respectfully submits that claim 1 is allowable over Ferrel. Claim 2 depends from claim 1 and is allowable as being dependent upon an allowable claim.

Independent claim 3 recites similar features as claim 1 and is allowable for at least similar reasons as claim 1. Claim 3 additionally recites "wherein each of said plurality of models comprises...a graphic element list containing at least one element chunk and a control element list containing at least one element chunk" and "wherein each said element chunk comprises an element chunk header and at least one element associated with its respective element chunk header."

Referring to Figures 5-7, for example, in an exemplary embodiment of the invention, each of said plurality of models 310 may comprise a graphic element list 311 containing at least one element chunk 320 and a control element list 312 containing at least one element chunk 320. Each of the element chunks may comprise an element chunk header 325 and at least one element 330 that may be associated with its respective element chunk header 325. Within an element list storage (e.g., graphic element list 311 and control element list 312), individual elements may be stored in groupings, or element chunks 320. Each element may be given a unique name, for example so that chunks may be determined merely by iterating over the names in the element list. See, e.g., Specification, page 11, lines 3-8.

Ferrel does not teach the model recited in claim 3. The Office Action, referring to Figure 14, aligns the claimed graphic element list with "<U>"; the first claimed at least one element chunk with "TEXT"; the recited control element list with "<WA>"; and the second claimed at least one element chunk with object data or object bitmap. "<U>" is a markup language tag indicating that the text below it should be underlined. See, Ferrel, col. 32, lines 13-14. "TEXT" is the text of a story, for example. See, Ferrel, col. 32, lines 14-16. "<WA>" is also a markup language tag that indicates a wrap advertisement style for an embedded object. See, Ferrel, col. 32, lines 17-19. Object data and object bitmap are components of an object that is part of a standard OLE structure. See, Ferrel, col. 32, lines 19-22. Clearly, the markup language tags "<U>" and "<WA>" are **not** the claimed graphic element list and control element list, respectively. Neither the <U> markup tag, nor the <WA> markup can be construed to contain a list of elements at all. Rather, they are merely modifiers for the text that follows them, and in fact are cited by Ferrel only as examples of the type of tagged data that may be present in MPML. Their presence is neither required nor used directly by Ferrel to organize elements into containing groups according to their meaning, as is the essence of the element lists in the present invention. Further, the rejected claims recite an element list containing the element chunks within it, each of which includes a unique within the list. This concept is important to facilitate loading and saving the element chunks within an element list individually and is not present in Ferrel at all. Similarly, the TEXT of a story, the object data, or object bitmap, for example, are **not** the claimed element chunk since they do not attempt to group

approximately equal number of elements together sizes for proposes of compression and encryption. In Ferrel, the markup tags are merely optional data that is not used or controlled by the invention for any “chunking” purpose whatsoever. Accordingly, claim 3 is not anticipated by Ferrel because Ferrel does not teach or suggest these additional features of claim 3.

In view of the above, Applicant respectfully submits that claim 3 is allowable over Ferrel. Claims 4-7 depend from claim 3 and are allowable as being dependent upon an allowable claim.

Independent claim 15 recites similar features as claim 3 and is allowable over Ferrel for at least similar reasons. Claims 16-18, 26, and 27 depend from claim 15 and are allowable as being dependent upon an allowable claim.

Independent claim 28 recites similar features as claim 3 and is allowable over Ferrel for at least similar reasons. Claims 29, 30, and 38 depend from claim 28 and are allowable as being dependent upon an allowable claim.

Independent claim 39 recites similar features as claim 3 and is allowable over Ferrel for at least similar reasons. Claims 49, 50, 52, 53, 55, and 56 depend from claim 39 and are allowable as being dependent upon an allowable claim.

Independent claim 58 recites similar features as claim 3 and is allowable over Ferrel for at least similar reasons. Claims 59-62 depend from claim 58 and are allowable as being dependent upon an allowable claim.

Independent claim 66 recites similar features as claim 3 and is allowable over Ferrel for at least similar reasons. Claims 67-70 depend from claim 66 and are allowable as being dependent upon an allowable claim.

Independent claim 75 recites similar features as claim 3 and is allowable over Ferrel for at least similar reasons. Claims 75-78 depend from claim 75 and are allowable as being dependent upon an allowable claim.

In view of the above, Applicant respectfully requests that this rejection be withdrawn.

Rejections under 35 U.S.C. § 103(a)

The Office Action on pages 8-11, in section 6, reject claims 8-9, 14, 19-20, 25, 31-32, 37, 40, 54, 57, 63, 71, and 79 under 35 U.S.C. § 103(a) as being unpatentable over Ferrel in view of U.S. Patent No. 6,076,105 to Wolff et al. Applicant respectfully traverses this rejection.

Claims 8, 9, and 14 depend from independent claim 3. As discussed above, Ferrel does not teach or suggest the recited features of claim 3. Wolff does not cure these deficiencies and claims 8, 9, and 14 are therefore allowable as being dependent from an allowable claim. Wolff teaches a system for distributed project management and is cited as teaching compressing an element chunk. Wolff, however, does **not** supplement Ferrel to teach the features of claim 3 that are not taught or suggested by Ferrel.

Claims 19, 20, and 25 depend from independent claim 15. As discussed above, Ferrel does not teach or suggest the recited features of claim 15. Wolff does not cure these deficiencies and claims 19, 20, and 25 are therefore allowable as being dependent from an allowable claim.

Claims 31, 32, and 37 depend from independent claim 28. As discussed above, Ferrel does not teach or suggest the recited features of claim 28. Wolff does not cure these deficiencies and claims 31, 32, and 37 are therefore allowable as being dependent from an allowable claim.

Claims 40, 54, and 57 depend from independent claim 39. As discussed above, Ferrel does not teach or suggest the recited features of claim 39. Wolff does not cure these deficiencies and claims 40, 54, and 57 are therefore allowable as being dependent from an allowable claim.

Claim 63 depends from independent claim 58. As discussed above, Ferrel does not teach or suggest the recited features of claim 58. Wolff does not cure these deficiencies and claim 63 is therefore allowable as being dependent from an allowable claim.

Claim 71 depends from independent claim 66. As discussed above, Ferrel does not teach or suggest the recited features of claim 66. Wolff does not cure these deficiencies and claim 71 is therefore allowable as being dependent from an allowable claim.

Claim 79 depends from independent claim 74. As discussed above, Ferrel does not teach or suggest the recited features of claim 74. Wolff does not cure these deficiencies and claim 79 is therefore allowable as being dependent from an allowable claim.

In view of the above, Applicant respectfully request that this rejection be withdrawn.

The Office Action on pages 11-16, in section 7, rejects claims 10-11, 21-22, 33-34, 41, 43-44, 46, 48, 51, 64, 72, and 80 under 35 U.S.C. § 103(a) as being unpatentable over Ferrel in view of U.S. Publication NO. 2002/0194209 to Bolosky et al. Applicant respectfully traverses this rejection.

Claims 10 and 11 depend from independent claim 3. As discussed above, Ferrel does not teach or suggest the recited features of claim 3. Bolosky does not cure these deficiencies and claims 10 and 11 are therefore allowable as being dependent from an allowable claim. Bolosky teaches a file format having encrypted "blocks" and is cited as teaching encrypting an element chunk. Bolosky, however, does **not** supplement Ferrel to teach the features of claim 3 that are not taught or suggested by Ferrel.

Claims 21 and 22 depend from independent claim 15. As discussed above, Ferrel does not teach or suggest the recited features of claim 15. Bolosky does not cure these deficiencies and claims 21 and 22 are therefore allowable as being dependent from an allowable claim.

Claims 33 and 34 depend from independent claim 28. As discussed above, Ferrel does not teach or suggest the recited features of claim 28. Bolosky does not cure these deficiencies and claims 33 and 34 are therefore allowable as being dependent from an allowable claim.

Claims 41, 43-44, 46, 48, and 51 depend from independent claim 39. As discussed above, Ferrel does not teach or suggest the recited features of claim 39. Bolosky does not cure these deficiencies and claims 41, 43-44, 46, 48, and 51 are therefore allowable as being dependent from an allowable claim.

Claim 64 depends from independent claim 58. As discussed above, Ferrel does not teach or suggest the recited features of claim 58. Bolosky does not cure these deficiencies and claim 64 is therefore allowable as being dependent from an allowable claim.

Claim 72 depends from independent claim 66. As discussed above, Ferrel does not teach or suggest the recited features of claim 66. Bolosky does not cure these deficiencies and claim 72 is therefore allowable as being dependent from an allowable claim.

Claim 80 depends from independent claim 74. As discussed above, Ferrel does not teach or suggest the recited features of claim 74. Bolosky does not cure these deficiencies and claim 80 is therefore allowable as being dependent from an allowable claim.

In view of the above, Applicant respectfully requests that this rejection be withdrawn.

The Office Action on pages 16-20, in section 8, rejects claims 12-13, 23-34, 35-36, 42, 45, 47, 65, 73, and 81 under 35 U.S.C. § 103(a) as being unpatentable over Ferrel in view of Bolosky, and in further view of Wolff. Applicant respectfully traverses this rejection.

Claims 12 and 13 depend from independent claim 3. As discussed above, Ferrel does not teach or suggest the recited features of claim 3. Additionally, as discussed above, neither

Bolosky nor Wolff cures these deficiencies and claims 12 and 13 are therefore allowable as being dependent from an allowable claim.

Claims 23 and 24 depend from independent claim 15. As discussed above, Ferrel does not teach or suggest the recited features of claim 15. Additionally, as discussed above, neither Bolosky nor Wolff cures these deficiencies and claims 23 and 24 are therefore allowable as being dependent from an allowable claim.

Claims 35 and 36 depend from independent claim 28. As discussed above, Ferrel does not teach or suggest the recited features of claim 28. Additionally, as discussed above, neither Bolosky nor Wolff cures these deficiencies and claims 35 and 36 are therefore allowable as being dependent from an allowable claim.

Claims 42, 45, and 47 depend from independent claim 39. As discussed above, Ferrel does not teach or suggest the recited features of claim 39. Additionally, as discussed above, neither Bolosky nor Wolff cures these deficiencies and claims 42, 45, and 47 are therefore allowable as being dependent from an allowable claim.

Claim 65 depends from independent claim 58. As discussed above, Ferrel does not teach or suggest the recited features of claim 58. Additionally, as discussed above, neither Bolosky nor Wolff cures these deficiencies and claim 65 is therefore allowable as being dependent from an allowable claim.

Claim 73 depends from independent claim 66. As discussed above, Ferrel does not teach or suggest the recited features of claim 66. Additionally, as discussed above, neither Bolosky nor Wolff cures these deficiencies and claim 73 is therefore allowable as being dependent from an allowable claim.

Claim 81 depends from independent claim 74. As discussed above, Ferrel does not teach or suggest the recited features of claim 74. Additionally, as discussed above, neither Bolosky nor

Wolff cures these deficiencies and claim 81 is therefore allowable as being dependent from an allowable claim.

In view of the above, Applicant respectfully requests that this rejection be withdrawn.

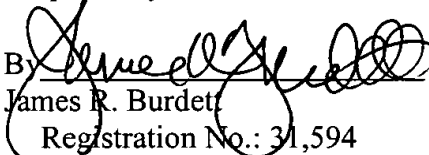
CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Dated:

Respectfully submitted,

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